

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

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AUDIENCE OF ONE PRODUCTIONS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 3:16-cv-795-HEH
	)	
IMPACT VENTURES, LLC f/k/a TNA	)	
ENTERTAINMENT, LLC, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

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**JOINT MOTION FOR CONSENT JUDGMENT**

Plaintiff Audience of One Productions, LLC, having filed its Complaint on September 27, 2016, and Defendants Impact Ventures, LLC f/k/a TNA Entertainment, LLC and Dean Broadhead, having answered AO1's Complaint on November 3, 2016, by their respective attorneys, respectfully move the Court for entry of the Final Consent Judgment in the proposed form attached as Exhibit 1.

Respectfully submitted,

AUDIENCE OF ONE PRODUCTIONS, LLC

By: /s/ Stanley A. Roberts

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*Counsel for Plaintiff Audience of One  
Productions, LLC*

SEEN AND AGREED:

IMPACT VENTURES f/k/a TNA ENTERTAINMENT, LLC and  
DEAN BROADHEAD

By: /s/ Jonathan M. Sumrell (w/ permission)  
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*Counsel for Defendants Impact Ventures f/k/a  
TNA Entertainment, LLC and Dean Broadhead*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

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